



NW Natural, DEQ's Construction Design Groundwater Modeling Comments

BAYUK Dana to: John Edwards

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Ben Hung, John Renda, "Michael Riley", "Carl Stivers

Cc: (cstivers@anchorqa.com)", Sean Sheldrake, "Peterson, Lance"
,"Coffey, Scott", GAINER Tom, "LARSEN Henning"

2 attachments



GASCO_revised CDR Comments_with Appendix F comments_4-May-12.docx



DEQ_Modeling_Comments-Nov4_Responses&CDR_AppF-18Jul12.docx

Hello John.

DEQ completed our review of Appendix F (Groundwater Model Documents) of the Construction Design Report (see footnote #1). DEQ's review included the supplement titled, "NW Natural Gasco Site: Documentation of Groundwater Model Modifications Since 2008" dated April 12, 2012 (April 12th Memorandum). DEQ's comments on the April 12th Memorandum are attached to this e-mail.

The attachment also replies to NW Natural's November 4, 2011 responses to DEQ's groundwater modeling comments included in our September 22, 2011 letter commenting on the Revised Interim Design Report (see footnote #2).

In addition to DEQ's comments on groundwater modeling, EPA's comments on the overall Construction Design Report, including Appendix F, are attached.

As Anchor requested during our meeting on July 2, 2012, DEQ is providing comments on groundwater modeling to facilitate Anchor's modifications and updates to the MODLOW model currently being used to support the final design of the Alluvium WBZ HC&C system. DEQ understands from the July 2nd meeting, updating the MODFLOW model is a current priority for Anchor.

For your information, DEQ is preparing a letter commenting on the design of the groundwater source control performance monitoring program proposed in the Construction Design Report, including the numbers, locations, and depths of monitoring wells and piezometers in the program. This letter will provide DEQ's perspective on the overall status of the "Framework" for finalizing the design of the Alluvium WBZ HC&C system and performance monitoring program.

As you know, NW Natural proposed the 5-step Framework in a letter dated November 4, 2011 that also responds to DEQ's September 22, 2011 comments letter. Step 2 of the Framework involves finalizing the designs of the HC&C system and performance monitoring network. Construction and initial testing of the HC&C system will be conducted under Step 3 and is scheduled for completion by the end of 2012. DEQ accepted the Framework as modified by our letter dated December 7, 2011. The December 7th letter should be referred to for additional details regarding DEQ's objectives for planning, designing, and constructing groundwater source control measures.

DEQ requests a meeting be arranged as soon as practicable to discuss the modeling comments included in the attachments. Please feel free to contact me with questions regarding this e-mail and/or the attachments, or to discuss dates for the proposed meeting.

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Footnote #1. Anchor QEA, LLC, "Revised Groundwater Source Control Construction Design Report, NW Natural Gasco Site," January 2012 (received January 31, 2012), a report prepared for NW Natural.

Footnote #2. Anchor QEA, LLC, 2011, "Draft Groundwater Source Control Final Design Report, NW Natural Gasco Site," May (received May 9th), a report prepared on behalf of NW Natural (DEQ recognizes the document as being the equivalent of the Revised Groundwater Source Control Interim Design Report)